

# C A D W A L A D E R

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October 17, 2019

VIA ECF

Honorable John G. Koeltl, U.S.D.J.  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: EXP Realty Advisors Associates, Inc. v. EXP Realty, LLC et. al, 1:19-cv-5903-JGK

Dear Honorable Judge Koeltl:

We write on behalf of Plaintiff EXP Realty Advisors Associates, Inc. ("Plaintiff") regarding the Initial Conference that was adjourned from its original date of September 23, 2019, and now scheduled for October 23, 2019 at 4:30PM. Before sending this letter to the Court, we provided a copy of it to Brian Bodine, counsel for Defendants EXP Realty, LLC and EXP World Holdings, Inc. (collectively, "Defendants"). Mr. Bodine indicated that the Defendants consent to the adjournment requested below.

The Parties continue to be engaged in settlement negotiations and request an adjournment of the October 23, 2019 Initial Conference so as to provide them with additional time to dispose of the matter, while avoiding unnecessary spending of party and judicial resources in this litigation. On September 18, 2019, the Defendants executed a Waiver of Service, with their response to the Complaint due 60 days from September 17, 2019. The Parties therefore request that the Initial Conference be adjourned until November 21, 2019, which is after the Defendants' Answer is due. With the Answer filed, the Parties will be in a better position to prepare the required Rule 26(f) status report for the Initial Conference if it is necessary.

As a result, the Parties respectfully request that the Initial Conference be adjourned until November 21, 2019, or such other date as may be convenient for the Court. One previous request for adjournment of this hearing date was requested and granted. No other scheduled dates would be affected by this adjournment.

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ADJOURNED TO FRIDAY,  
NOVEMBER 21, 2019,  
AT 4:30PM.

SO ORDERED,

John G. Koeltl

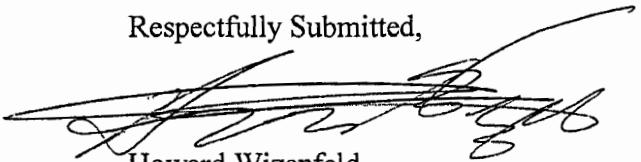
10/18/19, ✓ S O ✓

**C A D W A L A D E R**

Honorable John G. Koeltl, U.S.D.J.  
October 17, 2019

Thank you for your consideration of this adjournment request.

Respectfully Submitted,



Howard Wizenfeld

cc: Brian Bodine, via e-mail (BodineB@LanePowell.com)